

Dec. 21. 2011 9:47AM King & Ballow

No. 1572 P. 2

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December 21, 2011

MEMO ENDORSED

Via Facsimile (212) 805-7927
and United States Mail

Hon. Naomi Reice Buchwald
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

**Re: Urbont v. Sony Music Entertainment, et al.,
No. 11-cv-4516**

Dear Judge Buchwald:

I represent Plaintiff Jack Urbont in the referenced action. Urbont respectfully requests an extension of time to effect service on Defendant Denis Coles p/k/a Ghostface Killah.

This action was initially filed on June 30, 2011. On July 7, 2011, Defendants Sony Music Entertainment d/b/a Epic Records, and Razor Sharp Records, LLC were properly served with a summons and Complaint in this action. On August 8, 2011, Defendant Coles was properly served with a summons and Complaint.

On August 29, 2011, Urbont filed an Amended Complaint. On that same day, Defendant Coles' Answer to Urbont's initial Complaint was due. However, Coles never filed an Answer. Following the filing of his Amended Complaint, Urbont diligently attempted to again effect personal service on Defendant Coles. Multiple attempts to serve Defendant Coles have been unsuccessful. Defendant Coles has moved from the address at which he was served on August 8, 2011 and he uses a security detail for public appearances making it impossible for a process server to personally interact with him. The previous service on Defendant Coles has put him on notice of the action pending against him. However, instead of defending against this action Defendant Coles has evaded service of the Amended Complaint.

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Based on the difficulty in effecting personal service on Defendant Coles, Urbont requests the time to serve Defendant Coles be extended from December 27, 2011 until March 26, 2012.

Applica-
tion
granted.

Respectfully,

Richard S. Busch
Richard S. Busch

w/permission
AWC

FINAL EXTEN-
SION.

Naomi Reice Buchwald

12/21/11 *USDA*

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